

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
District of Oregon

Portland Division

Wash Ouma

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Portland State University et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:24-CV-991-IM
(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Wash Ouma
4110 SE Hawthorne Blvd # 741
Portland, OR 97214

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

107570

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Portland State University

630 SW Mill Street

Portland

Oregon 97201

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Portland State University Registrar's office

630 SW Mill Street

Portland

Oregon 97201

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

28 USC # 1331

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

See the attached Facts And reasons

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See the attached Facts + Statement of Claims

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See the attached showing the damages and relief Plaintiff ask the Court for.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

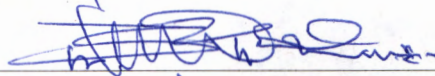
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

June 10 / 2024

Signature of Plaintiff



Printed Name of Plaintiff

Wash Ouma

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

June 10, 2024

1

Atten. Dr. Ann Cudd/President
 Portland State University
 630 SW Mill street,
 Portland, Oregon 97201

Re: Case No: (In The United States District Court- Oregon, Portland Div)
 wash ouma (plaintiff) v. Portland State University & PSU' Registrars Dept (Defendants)

Atten. Dr. Cudd/President of PSU:

1) As you (and your Attorney, Ms. Erin Burris) are clearly aware, it has been plaintiff's / my desire to explore the possibility of voluntary, peaceful, and civil resolution of these matters. 2) Evidences also show that plaintiff, in **Good Faith**, have already generously given you (as the top leader and head of the Defendants PSU et al) more than enough time and opportunities to explore possibility of voluntary, peaceful, and civil resolution of these matters- but no response from any of you. 3) Also as you are clearly aware, plaintiff, in good faith, also already provided you with a brief summary of the facts of these claims, followed by a demand for peaceful, civil, settlement. 4) And as you are also aware, I/ plaintiff, in good faith, repeatedly provided you with these said informations on/ about October 31/2023; Nov. 1, 2023; 4/16th/ 2024; May 22/2024, etc. 5) Again, I am, again, providing these information to you (and to your attorney Ms. Burris) , in **Good Faith**, for quick negotiating settlement of these matters. Please, please, please respect this- please.

The Defendants PSU et al' Reckless Fraudulent Misrepresentation
Of this matter, et cetera: Continued even on December 14, 2023

**The Defendants PSU's FALSE Info/
 Fraudulent Misrepresentation**

**Plaintiff's
 Facts/Truth**

1) that Plaintiff is claiming for a degree
 in **social studies** (Exhibit 7)

1) plaintiff **NEVER** claimed a
 degree in social studies

2) that PSU has awarded plaintiff with a
political science minor degree
 (Exhibits 6, 7)

2) PSU has **NEVER** awarded
 plaintiff with a "**political science**"
 minor degree (Exhibit 1)

3) that Plaintiff became a PSU student for
 the first time in 1997 through 2002
 (Exhibit 7)

3) plaintiff became a PSU student
 for the first time in the year 1992

PSU's FALSE/Fraudulent Misrepresentation

4) that plaintiff only claim for a "degree"
(Exhibit 7)

5) that plaintiff (who is **black**) is
academically failure &
unqualified, **n-word**, etc

7) that on June 17, 2023 PSU awarded
Plaintiff with liberal studies degree
and **political science** minor degree
(Exhibits 6, 7)

Plaintiff's FACTS**2**

4) plaintiff claim for equal &
appropriate **timely** & adequate
services, informations, advises,
direction, degrees, diplomas,
certificates, outputs, et cetera
as the Defendant PSU have
been **timely** providing for their
other students, especially to
students of **None-color (white**

5) plaintiff has always been in
a PSU good academic standing
with **3.77 GPA** and **69** credit
hours in **masters/Ph.D** programs.
Plaintiff also has **227** credit hours for
bachelor's degrees programs

7) PSU has **NEVER** awarded
plaintiff with a "**political science**"
minor degree at any time. And
Also plaintiff has **NEVER** got any
degree from PSU on June 17, 2023

8) Evidences show that the **only** degree plaintiff has ever received from
PSU was on August 14, 2023; 9) And it was a liberal studies degree-which
their/ PSU's Registrars "higher ups" officials **promised to immediately**
and **timely** award plaintiff with- **without** any further delay in July 28, 2022.
10) The Defendants PSU et al, yet again **breached** their contract when they
FAILED to **timely** provide plaintiff even with liberal studies degree on/in
July 28, 2022 as they promised to do. 11) And by the way, on/ about
August 14,2023- the Defendants PSU et al, yet again, in **Bad Faith**,
awarded plaintiff with **only** a liberal studies degree. 12) This was more than
a year later after they/PSU promised to **immediately** and **timely** provide
plaintiff with it on/in July 28, 2022; 13) Which further means, they /the
Defendants PSU et al yet again **FAILED** to **timely** provide plaintiff (who is
black) with services, degrees, diplomas, information, certificates, output, et
cetera as they/the Defendants generally/ usually, **timely** provide to their

3

other students especially those students of **non-color** (**white** students).
 14) To make it even much worse, the Defendants PSU et al have already grossly **breached** their contract/duty when the Defendants PSU and PSU's Registrars Dept **FAILED** to **timely** provide plaintiff with undergraduate degrees, diplomas etc **before** registering plaintiff (and before collecting tuition fees, etc from plaintiff) for **masters/Ph.D** courses, practicums & research works. 15) On the other hand, the Defendants PSU et al have been **timely** awarding undergraduate degrees, diplomas, et cetera to their other students of **none-color** (white students) **before** registering them (white students) for graduate courses. 16) Plaintiff/I have been even called some derogatory/slurs names including: **n-word**, academic failure, etc by a PSU Registrar Dept official who is white. They racially discriminated against me. 17) The Defendants PSU discriminated against plaintiff because he is black. 18) And by the way, plaintiff blindly and loyally followed the PSU's advises, guidance, directions, rules, et cetera for plaintiff's academic dreams. 19) Their, **bad faith** actions and inactions (and their **failure**) to **timely** provide plaintiff even with this liberal studies degree as they promised on July 28, 2022: forced plaintiff into further more financial debts, financial borrowings, and financial burden- for tuition fees, textbooks, study materials, other related fees and costs. 20a) Which also means PSU should reimburse plaintiff/me with funds for said debts and outstanding payments. 21) et cetera

SETTLEMENT DEMAND:

- 1) Payment in the sum of \$3,000,000.00 (three million dollars & zero cents) for Non-Economic and/or Punitive damages
- 2) Payments in sum of \$2,500,000.00 (two million five hundred thousand dollars & Zero cents only) for Economic damages.
- 3a) Payments of outstanding financial debts on loans which the Defendants PSU et al' actions and/or inactions which forced plaintiff in borrowing to cover for PSU's fees etc for undergraduate courses taken by plaintiff in the Fall Term 2022, Winter Term 2023, and Spring Term 2023; 3b) Plaintiff would have **NOT** taken any of these undergraduate courses- should the Defendants PSU et al have **timely** and **immediately** provided plaintiff with said liberal studies degree as PSU promised that they would in July 28, 2022
- 4) For the Court's fees, and other related cost and reimbursements.

Sincerely,

wash ouma
 wash ouma (plaintiff)

Dated: 10th Day of June , 2024.

cc. Dr. Ann Cudd/President
 Portland State University
 630 SW mill street
 Portland, Oregon 97204

Attorney Erin Burris
 Miller Nash LLP
 1140 SW Washington str #700
 Portland, Oregon 97205

wash ouma
 4110 SE Hawthorne #741
 Portland, Oreg 97214

Exhibit *a*

BROOKLYN
1410 SE POWELL BLVD
PORTLAND, OR 97202-2398
(800) 275-8777

05/22/2024 12:46 PM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$9.85
Flat Rate Env			
Portland, OR 97201			
Flat Rate			
Expected Delivery Date			
Thu 05/23/2024			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$4.40
Tracking #:			
70190140000034169371			
Return Receipt			\$3.65
Tracking #:			
9590 9402 7061 1225 7622 69			
Total			\$17.90
Garden Delights	1	\$13.60	\$13.60
Grand Total:			\$31.50
Cash			\$35.00
Change			-\$3.50

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: <https://postalexperience.com/Pos>
or scan this code with your mobile device,



or call 1-800-410-7420.

UFN: 406759-0027
Receipt #: 840-59700111-1-6505048-2
Clerk: 01

PS Form 3811, July 2020 PSN 7530-02-000-9063

7019 0140 0000 3416 9371

9590 9402 7061 1225 7622 69



Dr. Ann Cudd / President
Portland State University
630 SW Mill Street
Portland, Oregon 97201

- SENDER: COMPLETE THIS SECTION
- Complete items 1, 2, and 3.
 - Print your name and address on the reverse so that we can return the card to you.
 - Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*

B. Received by (Printed Name) *[Signature]*

C. Date of Delivery *5/23/24*

D. Is delivery address different from item 1? ☒ Yes ☐ No

If YES, enter delivery address below:

3. Service Type
- ☐ Adult Signature Restricted Delivery
- ☐ Adult Signature Restricted Mail
- ☐ Certified Mail
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
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- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

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FROM:

Wash Ouma
4110 SE Hawthorne #741
Portland, OR 97214

TO:

Dr. Ann Cudd / President
Portland State University
630 SW Mill Street
Portland, OR 97201



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Exhibit **b**

May 21, 2024

1

Atten. Dr. Ann Cudd/President
 Portland State University
 670 SW Mill street,
 Portland, Oregon 97201

FILED MULTNOMAH CO
 '24 MAY 21 AM

Re: Case No: 23CV44594 (Multnomah Circuit Court)
 wash ouma (plaintiff) v. Portland State University & PSU' Registrars Dept (Defendants)

Atten. Dr. Cudd/President of PSU:

1) As you (and your Attorney, Ms. Erin Burris) are clearly aware, it has been plaintiff's / my desire to explore the possibility of voluntary, peaceful, and civil resolution of these matters. 2) Evidences also show that plaintiff, in **Good Faith**, have already generously given you (as the top leader and head of the Defendants PSU et al) more than enough time and opportunities to explore possibility of voluntary, peaceful, and civil resolution of these matters- but no response from any of you. 3) Also as you are clearly aware, plaintiff, in good faith, also already provided you with a brief summary of the facts of these claims, followed by a demand for peaceful, civil, settlement. 4) And as you are also aware, I/ plaintiff, in good faith, repeatedly provided you with these said informations on/ about October 31/2023; Nov. 1, 2023; April 2, 2024; April 16, 2024; etc. 5) Again, I am, again, providing these information to you (and to your attorney Ms. Erin Burris) , in **Good Faith**, for quick negotiating settlement of these matters. Please, please, please

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 (Exhibit 7)

3) plaintiff became a PSU stude
 for the first time in the year 1992

PSU's FALSE/Fraudulent Misrepresentation

2

- 4) that plaintiff only claim for a "degree" (Exhibit 7)
- 4) plaintiff claim for equal & appropriate **timely** & adequate services, informations, advises, direction, degrees, diplomas, certificates, outputs, et cetera as the Defendant PSU have been **timely** providing for their other students, especially to students of **None-color (white**
- 5) that plaintiff (who is **black**) is academically failure & unqualified, **n-word**, etc
- 5) plaintiff has always been in a PSU good academic standing with **3.77 GPA** and **69** credit hours in **masters/Ph.D** programs. Plaintiff also has **227** credit hours for bachelor's degrees programs
- 7) that on June 17, 2023 PSU awarded Plaintiff with liberal studies degree and **political science** minor degree (Exhibits 6, 7)
- 7) PSU has **NEVER** awarded plaintiff with a "**political science**" minor degree at any time. And Also plaintiff has **NEVER** got any degree from PSU on June 17, 2023

8) Evidences show that the **only** degree plaintiff has ever received from PSU was on August 14, 2023; 9) And it was a liberal studies degree-which their/ PSU's Registrars "higher ups" officials **promised to immediately** and **timely** award plaintiff with- **without** any further delay in July 28, 2022. 10) The Defendants PSU et al, yet again **breached** their contract when they **FAILED** to **timely** provide plaintiff even with liberal studies degree on/in July 28, 2022 as they promised to do. 11) And by the way, on/ about August 14,2023- the Defendants PSU et al, yet again, in **Bad Faith**, awarded plaintiff with **only** a liberal studies degree. 12) This was more than a year later after they/PSU promised to **immediately** and **timely** provide plaintiff with it on/in July 28, 2022; 13) Which further means, they /the Defendants PSU et al yet again **FAILED** to **timely** provide plaintiff (who is black) with services, degrees, diplomas, information, certificates, output, et cetera as they/the Defendants generally/ usually, **timely** provide to their

other students especially those students of **non-color (white students)**.

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SETTLEMENT DEMAND:

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- 2) Payments in sum of \$2,500,000.00 (two million five hundred thousand dollars & Zero cents only) for Economic damages.
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- 4) For the Court's fees, and other related cost and reimbursements.

Sincerely,

Wash Ouma
wash ouma (plaintiff)

Dated: 21st Day of May , 2024.

cc. Dr. Ann Cudd/President
Portland State University
630 SW mill street
Portland, Oregon 97205

Attorney Erin Burris
Miller Nash LLP
1140 SW Washington str #700
Portland, Oregon 97201

wash ouma
4110 SE Hawthorne #741
Portland, Oreg 97214

Exhibit e



BROOKLYN
1410 SE POWELL BLVD
PORTLAND, OR 97202-2398
(800)275-8777

04/23/2024

11:32 AM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$9.85
Flat Rate Env			
Portland, OR 97205			
Flat Rate			
Expected Delivery Date			
Wed 04/24/2024			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$4.40
Tracking #:			
70211970000174475993			
Return Receipt			\$3.65
Tracking #:			
9590 9402 7061 1225 7622 21			
Total			\$17.90
Grand Total:			\$17.90
Cash			\$20.00
Change			-\$2.10

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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UFN: 406759-0027
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Clerk: 01

PS Form 3811, July 2020 PSN 7530-02-000-9053

Article Number (Transfer from service label)
7021 1970 0001 7447 5993

9590 9402 7061 1225 7622 21



Postnet, 0R-97205

Attorney Erin Burris

Miller Nash Law Firm

1140 SW Washington Street

Portland, OR 97205

Article Addressed to:

Article Addressed to:

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SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

If YES, enter delivery address below:

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4110 SE Hawthorne #741
Portland, Oregon 97214

TO:

Attorney Erin Burris
Miller Nash Law Firm
1140 SW Washington Street #700
Portland, Oregon 97205

In The United States District Court For The District Of i
 Oregon, Portland Division Case No.
 wash ouma v. Portland State Univ., PSU' Registrar' Office
 (plaintiff) (Defendants)

JURY Trial Requested

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Here Are SOME Of The Plaintiff's Summary Of The Facts & Reasons Why
 The Defendants Portland State University, et al Should Be Held Accountable:

- 1) State of Oregon's laws such as ORS section 659-850: Discrimination in Education prohibited: rule 1 as used in Section (a)(A): Discrimination means any act that unreasonably differentiates treatment intended or **unintended**- or any act that is fair in form but discriminatory in operation, etc are prohibited. Evidences show plaintiff have been discriminated against & **Recklessly** mistreated/treated by the Defendants PSU et al.
- 2) Plaintiff claim for **equal** & appropriate **timely** & proper services, information, advises, directions, degrees, diplomas, certificates, outputs, et cetera as the Defendants PSU, et al have been **timely** providing for their other students especially to their **non-colored students**.
- 3a) The Defendants PSU et al, yet again **breached** their contract & duty when they/ PSU recklessly **Failed** to **timely** award plaintiff even with a liberal studies degree- which their PSU' Registrars '(s)' "Higher-ups" officials **promised** to **immediately** and **timely** award plaintiff with- **Without** any further delay in July 28, 2022. 3b) The Defendants PSU et acted in **bad faith** when they awarded plaintiff with only this liberal studies degree more than/ over a year latter (on August 14, 2023). They acted arbitrarily and in bad faith.
- 4) The Defendants PSU et al **Ignored** & **Failed** to provide plaintiff with **equal** and **timely** appropriate and **timely** proper- services, advises, informations, degrees, diplomas, output certificates, et cetera as the Defendants PSU et al have been **timely** and fairly providing to their other students, especially to their **non-colored (white)** students. Plaintiff is black
- 5) Education is a basic human right that works to raise men and women out of poverty, level of inequality, etc . But PSU has **Robbed** and **Denied** me these opportunities in life. Therefore members of **JURY** from **Diverse** public communities are entitled & have right to even hear **Oral** testimonies from plaintiff's witnesses and see evidences to make determination as to who is right and who is wrong- and whether PSU **violated** my rights.
- 6) Brown v. Turner, 497 So. 2d 1119, 1120 (Ala. 1986). Case goes to a jury if there is "a mere gleam, glimmer, spark, or a scintilla". Here in this matter, plaintiff have presented more than enough evidences which support my case against the Defendants
- 7) Preponderance of evidence means claim is more likely true than not true.

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8) The Defendants PSU, et al' **Reckless Fraudulent Misrepresentation** of these matters to those who are concerned even to this Court: continued even on December 14, 2023.

7b) The Defendants PSU et al repeatedly **LIED** about these matters to those who are concerned and even to this court. They/the Defendants PSU et al recklessly **LIED** that :
 a) they provided plaintiff with a "**Political Science**" degree minor. b) **Lied** that the plaintiff began his studies at PSU in the year 1997 : yet they have the **custody** of evidence records which clearly indicating that plaintiff began as PSU student in the year 1992.

c) They also recklessly **lied** that plaintiff claim for "**Social Studies**" degree- but evidences show plaintiff have **Never** claimed for "**Social Studies**" degree. d) they also **lied** that plaintiff only claim for a " degree". The truth is that plaintiff do claim for **equal** and appropriately **timely** & proper services, academic advises, informations, degrees, diplomas, certificates, outputs, et cetera as the Defendants PSU et al have been usually and **timely** providing for their other students especially for their **non-colored (white) students**.

9a) The Defendants PSU's Educational Malpractice: a) The Defendants PSU acted in **bad faith** and/or **arbitrarily** when the Defendants PSU et al **failed** and **ignored** to **timely** provide plaintiff with undergraduate degrees, diplomas, et cetera **BEFORE** registering plaintiff in such costly/expensive **masters/Ph.D** courses, practicums, research works, seminars et cetera. - 8b) On the other hand evidences show that the Defendants PSU usually **timely** provide their other students especially their **non- colored (white) students** with undergraduate degrees, diplomas, proper advises, proper services, proper info and proper guidance **before** registering them (white students) in masters/graduate programs

10) The Equal Protection Clause of the 14th Amendments provide that a state may Not deny to any person within its jurisdiction the **equal** protection of law. The Defendants PSU et al have **failed** to **timely** provide plaintiff (who is **black**) with **equal** academic services, advises, informations, guidance, degrees, diplomas as they/the Defendants PSU et al usually and **timely** properly providing to their other **non-colored (white) students**.

11) The Defendants PSU et al have violated the plaintiff's protected rights. Plaintiff here is **black**. And calling/labeling a black person with a GPA 3.77 in master/Ph.D courses, practicums, seminars, research works et cetera- as academic failure, **n-word** et cetera as plaintiff have been labeled/ called by the Defendants PSU et al is **unjust**. And, they should be held accountable .Therefore 28 USC # 1331 also is at issue in this case.

12) Members of **Jury** from the **Diverse** public community are also entitled and have rights to hear **oral** testimonies even from plaintiff's witnesses and see evidences- to help them (members of **Jury**) make determination as to who is right and who is wrong.

13) The United States 9th Circuit Court has repeatedly instructed that " Courts **must** construe pro se filings **liberally**". *Hebbe v Pille* 627 3d 338 342. Plaintiff is pro se filer.

14) My/plaintiff' witnesses will testify before the jury with more evidences supporting plaintiff's case against the Defendants PSU , et al and more reasons why the Defendants PSU should be held accountable for all of these harms and damages which they/the Defendants PSU, et al caused on plaintiff. Also see details in page 1- 18 of/in this filing

continue from pages i & ii

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PART I : INTRODUCTION OF THE MATTER:

The Defendants Portland State University et al have repeatedly practiced injustices, discriminations, oppressions, biases, et cetera against plaintiff when the Defendants PSU et al **breached** their contract and duty and they **failed** and ignored to **timely** provide plaintiff with equal and adequate and appropriate **timely**- proper advises, services, informations, direction, outcomes, degrees, diplomas, certificates, et cetera as they/ the Defendants PSU have been generally **timely** providing to their other students especially to those students of **None-color**. 2) Further, evidences show that even on/about December 14, 2023, the Defendants PSU et al recklessly continued with their **fraudulent misrepresentation** of these matters- when they/ the Defendants PSU et al knowingly and recklessly provided those concerned and even this court with- **false, fraudulent and misleading information:**

a) regarding plaintiff's academic qualifications; b) they **lied** and continued to lie that the Defendants PSU "awarded" plaintiff with a **political science** minor degree on June 17, 2023; c) also they **lied** that plaintiff is claiming for a "**social studies**" degree; d) also they **lied** that plaintiff became a PSU student for the first time in the year 1997 through year 2002. e) Also they **lied** that plaintiff only claim for "a degree". Plaintiff claim for **equal** and appropriate **timely** proper services, academic advises, information, degrees, diplomas, as they/PSU been **timely** providing for their **non-colored white students**.

e) the list of the Defendants PSU' reckless fraudulent misrepresentation of this matter goes on and on. 3) Plaintiff have, in **Good Faith**, provided the Defendants PSU et al with plenty of time and opportunities to resolve these matters peacefully, but the Defendants PSU have, in **Bad Faith**, negligently **ignored** and **failed** to even reply. 4) Plaintiff also believe that they/ the Defendants PSU et al practiced (and continue to practice) these **injustices**, and **discriminatory** conducts against plaintiff because plaintiff is black and/or because of plaintiff's ethnicity, skin color, spiritual faith, race, et cetera. 5) Also plaintiff believe that they/the Defendants PSU recklessly continue to **fraudulently misrepresent** this matter and **undermine** plaintiff's academic Qualifications as they again did on 12/14th/ 2023 is because plaintiff is black .

PART II: STATEMENTS OF FACTS, ARGUMENTS & CLAIMS:

First: 1) Evidences show that the **only** degree plaintiff has ever received from PSU was on August 14, 2023 (Exhibit 1 & 2); 2) And it was a liberal studies degree-which their/ PSU's Registrars "higher ups" officials **promised** to immediately award/provide plaintiff with- without any further delay in/on July 28, 2022 (Exhibits 8), 3) The Defendants PSU et al, yet again **breached** their contract when they **FAILED** to **timely** provide plaintiff even with this said liberal studies degree on/in July 28, 2022 as

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they/the Defendants PSU promised to do (Exhibit 8). **4)** And by the way, on/ about August 14,2023- the Defendants PSU yet again, in **Bad Faith**, awarded plaintiff with **only** a liberal studies degree. **5)** And this was more than a year later after they/the Defendants PSU promised to **immediately** and **timely** provide plaintiff with it on/in July 28, 2022; **6)** which further means that they /the Defendants PSU et al yet again **FAILED** to **timely** provide plaintiff (who is black) with proper services, degrees, diplomas, information, certificates, output, etc as they/the Defendants PSU et al generally/ usually, **timely** provide to their other students especially those students of **non-color (white students)**. **7)** And, this also means that plaintiff have been discriminated against by the Defendants Portland State U et al because plaintiff is a person of color **black**. **8)** And by the way, the Equal Protection Clause of the 14th Amendment provide that a state may not deny to any person within its jurisdiction the equal protection of law.

SECOND: **1)** To make it even much worse, the Defendants PSU et al have already grossly **breached** their contract and duty when the Defendants PSU and PSU Registrars Dept **FAILED** to **timely** provide plaintiff with undergraduate degrees, diplomas etc **before** registering plaintiff (and before collecting tuition fees, et cetera from plaintiff) for **masters/Ph.D** courses, practicums and research works. **2)** But on the other hand, the Defendants

PSU et al have been **timely** awarding undergraduate degrees, diplomas, and proper services, advises, et cetera to their other students of **none-color** (white students) **before** registering them for any masters courses/classes.

For example see (Exhibit 8): June , 2022 e-mail communication between the Defendants PSU's academic advisor and plaintiff. Plaintiff writes:

“ Hi -- Please accept my sincerest appreciation for all your help and support, especially with this petition.--Again, I am deeply sorry that I only followed my former PSU academic advisors- who advised me to take (and continue with) graduate level classes. Which means I thought I was done with undergraduate studies.-- Therefore please kindly make that petition on my behalf- to receive those undergraduate degrees right now WITHOUT taking any other further classes. Thanks again for all your help and support-- especially on/with this petition”.

Also see (Exhibit 8): July 28, 2022 e-mail communication between the Defendants PSU's academic advisors and plaintiff. The Defendants PSU's academic advisors informs plaintiff that:

“Hello wash: After careful consultation with my higher ups, we feel it is best to request that a Bachelor's in liberal studies is the best option. If this is something that you agree to, please send a statement simply stating that this is the degree that we are asking for”.

Also see (Exhibit 8) plaintiff's e-mail communication with the Defendants PSU's advisors and “higher ups” . Plaintiff writes/ reply back to them:

“Hi-- Thank you very much- BA in liberal studies degree will just be fine for now. Thanks.”

PART A: The Defendants PSU's BREACH Of Their Contract & Duty:

First: 1a) Evidences also show that the Defendants PSU have acted **arbitrarily** and in **bad faith** when the Defendants PSU et al so repeatedly **breached** their contract to **timely** provide plaintiff with equal & appropriate **timely** services, advises, informations, directions, degrees, diplomas, output, certificates, guidance, et cetera as they/ Defendants PSU have been usually **timely** providing to their other students especially to those students of **none-color (white students)**. This is racial discrimination, racial prejudice.

Second: 1a) The Defendants PSU **Breached** their contract and acted in **bad faith** when the Defendants PSU et al **Failed** and **ignored** to provide plaintiff with undergraduate degrees, diplomas, certificates, et cetera **before** registering plaintiff in such very expensive/costly **masters/Ph.D** courses, practicums, research works. **2a)** On the other hand, evidences show that the Defendants PSU et al generally **timely** provide/award their other students especially students of **none color (white students)** with undergraduate degrees, diplomas, proper services, proper informations, proper advices, etc **before** registering them (white students) for any masters/graduate courses. **2b)** This also means the Defendants PSU racially discriminated against plaintiff when the Defendants PSU **failed to timely** provide plaintiff with

such equal services, proper information, etc **before** registering plaintiff in those said very expensive and very costly **masters/Ph.D** courses, practicum,

3a) As a result they/PSU further caused/cause plaintiff emotional distress symptoms such as headaches, anxiety, fear, insomnia, headache, et cetera.

3b) And evidence also clearly show how the Defendants PSU's actions and inactions have **damaged** plaintiff's economic, academic, etc dreams in life.

Third: 1a) Also the Defendants PSU at al **Breached** their contract and/or duty and even acted **arbitrarily** and in **bad faith** when the Defendants PSU et al **FAILED** to **timely** award plaintiff even with this liberal studies degree which they/ the Defendants PSU promised in/on July 28, 2022- that they/PSU would **immediately** and **timely** award plaintiff with- **without** any further delay (Exhibit 8); **1b)** And by the way, evidences show that it was more than/ over a year later (on August 14, 2023) was when plaintiff got this said liberal studies degree from them/PSU (see Exhibits 1 and 2)

In their e-mail communication to plaintiff on Thursday, July 28, 2022: the Defendants PSU's academic advisor writes:

“Hello Wash: after careful consultation with my higher ups, we feel it is best to request that a bachelor's in liberal studies is the best option. If this is something that you agree to, please also send a statement simply stating that this is the degree that we are asking for-”.

Plaintiff replied back to the Defendants Portland State University et al:

“Hi--Thank you very much- BA in liberal studies degree will just be fine for now. Thanks”.

Fourth: And by the way, also see the attached evidences (Exhib 3 &4) which are information from the PSU's Registrars Office showing their/ PSU's general **Requirements For Graduation:** **1a)** they inform students that a PSU bachelor/baccalaureate degree requires **180 credit hours** and a **2.00 GPA;** **1b)** Also they inform students that advanced/masters degree requires a **45 credit hours** and a **3.00 GPA;** **1c)** Also they inform students that they/PSU also give/award credits for **portfolios & for prior learning;** **2)** This further proves that the Defendants PSU et al have directly and/or indirectly discriminated against plaintiff, and also **breached** their contract when they/PSU **failed to timely** provide plaintiff with degrees, diplomas, certificates, proper services, et cetera as they/the Defendants PSU generally **timely** awarding/ providing to their other students especially those students of **none color** (white students) even to those with much **lower** academic GPA, lower grades, lower/worse academic qualification hours, et cetera . **3)** Again, plaintiff have **always** been in a PSU's **good** academic standing- with a **3.77 GPA** plus **69** credit hours in **Masters/ Graduate/ PhD** courses, practicums & research works, etc- which are way more than **45** credit hours which Defendants PSU normally require from their other graduate students especially to those students of **none color.** **3b)** And by the way, in addition, plaintiff have also already completed and provided them with **portfolios**

which PSU requested plaintiff to provide them with- for those said pending **masters/Ph.D** degrees, diplomas, certificates- but they/PSU still **Failed** to **timely** provide plaintiff with any of those **masters/Ph.D** degrees, diplomas, certificates, et cetera as they promised. **4a)** And by the way, also plaintiff have already earned a PSU'S **227 Credit hours** in /on **Undergraduate/ Bachelors** courses/studies (plus practicums and research works)- again which are way more than **180 Credit hours** which the Defendants PSU et al usually require from their other undergraduate students (especially from their **none colored/white** students) for Bachelors degrees, diplomas, certific

4b) Also PSU often **Waive** some of the required courses for graduation for many of their other students especially white students even with lower GPA.

FIFTH: 1) Also see (Exhibit 8) June , 2022 e-mail communication between the Defendants PSU's advisors and plaintiff. Plaintiff writes :

“please accept my sincerest appreciation for all your helps and support- especially with this petition.—Again, I am deeply sorry that I only followed my former PSU’ academic advisor- who advised me to take (and continue with) graduate level classes; Which means I thought I was done with undergraduate studies.—Therefore, please kindly make that petition on my behalf to receive those undergraduate degrees right now without taking any other further classes. Thanks again—especially on/with this petition.”

2) This also confirms that the Defendants PSU et al **breached** their duty and contract when they/the Defendants PSU **FAILED** to **timely** provide plaintiff with proper advices, proper services, proper informations, proper advises, undergraduate degrees, diplomas, certificates, before registering plaintiff in those expensive/costly **masters/Ph.D** courses, practicums, etc.

PART B: Defendants PSU'S EDUCATIONAL MALPRACTICE:

First: 1a) Evidences also show that the Defendants PSU have acted **arbitrarily** and in **bad faith** when they/ the Defendants PSU so repeatedly **Breached** their contract to **timely** provide plaintiff with **equal** and proper **timely** services, advises, informations, direction, outputs, degrees, diplomas, certificates, outcomes, et cetera as they/ Defendants PSU have been usually and **timely** providing to their other students especially to those students of **none-color (white students)**. This is racial discrimination, racial prejudice.

Second: 1a) The Defendants PSU acted in **bad faith** or **arbitrarily** when the Defendants PSU et al **failed** and **ignored** to provide plaintiff with undergraduate degrees, diplomas, certificates before registering plaintiff in such expensive/costly **masters/graduate** courses, practicum, research work.

2a) On the other hand, evidences show that the Defendants PSU generally **timely** provide/award their other students especially students of **none color** with undergraduate degrees, diplomas, proper services, proper informations, proper advices, et cetera before registering them for any masters courses.

2b) This also means the Defendants PSU racially discriminated against plaintiff when the Defendants PSU **failed** to provide plaintiff with such proper services, proper information, et cetera before registering plaintiff in those said very expensive and very costly masters courses, practicums, etc

3a) As a result they/PSU further caused/cause plaintiff emotional distress symptoms such as headaches, anxiety, fear, insomnia, headache, et cetera.

3b) And evidence also clearly show how the Defendants PSU's actions and inactions have **damaged** plaintiff's economic and academic dreams in life.

Third: 1a) Also the Defendants PSU acted **arbitrarily** and in **bad faith** when they/the Defendants PSU et al **FAILED** to **timely** award plaintiff even with this liberal studies degree which they/ the Defendants PSU promised that they/PSU would **immediately** and **timely** award plaintiff with- **without** any further delay in/on July 28, 2022 (Exhibit 8); **1b)** And by the way, it was more than a year later (on August 14, 2023) was when plaintiff received this said liberal studies degree from PSU (see Exhibit 1 and Exhibit 2)

In their e-mail to plaintiff on Thursday, July 28, 2022: the Defendants PSU's academic advisors write and inform plaintiff that:

"Hello Wash: after careful consultation with my higher ups, we feel it is best to request that a bachelor's in liberal studies is the best option. If this is something that you agree to, please also send a statement simply stating that this is the degree that we are asking for-".

Plaintiff replied back to the Defendants PSU's advisors and their higher ups:

"Hi--Thank you very much- BA in liberal studies degree will just be fine for now. Thanks".

The Defendants PSU et al yet again, in **Bad Faith**, **breached** their contract and duty when they **Failed** to **timely** award/ provide plaintiff even with this said liberal studies degree as they promised that they would in July 28, 2022 It was more than a year later (on August 14, 2023) was when PSU awarded plaintiff with this said liberal studies degree- and not anything more that.

PART C : O.R.S 659-850 DISCRIMINATION

First: 1a) The Defendants Portland State University, et al violated O.R.S 659-850 . Resp.1, 14, ECF11. ORS 659-850 prohibits discrimination in education where the school is financed in whole or in part by money appropriated by the state legislature. O.R.S 659.850(2). For the purpose of the statute: discrimination means:

any act that unreasonably differentiate treatment, intended or unintended, or any act that is fair in form but discriminatory in operation, either of which is based on race, color, religion, ethnicity, sex, sexual orientation, gender identity, national origin, marital status, age or disability.

2) The Defendants PSU's actions and/or inactions against plaintiff regarding these matters have been discriminatory. And plaintiff believe that they/ the Defendants PSU et al, in **Bad Faith**, have practiced these injustices against plaintiff and this matter the ways they have because plaintiff is black, and/ or because of plaintiff's racial identity, ethnicity, color, spiritual faith, etc.

Second: 1a) Therefore plaintiff **rightly** filed this lawsuit against the Defendants PSU **Not** only for **breaching** their contract to **timely** provide plaintiff with equal and appropriate **timely** adequate proper services, advise, information, output, outcomes, degrees, diplomas, certificates, et cetera as they/ the Defendants PSU have been generally **timely** providing to their other students especially to those students of **none-color**; **2a)** Further, the Defendants PSU et al acted **arbitrarily** and/or in **Bad Faith** when they/ the

Defendants PSU et al **FAILED** to **timely** provide/ award plaintiff with any undergraduate degrees, diplomas, certificates, et cetera **before** registering plaintiff in these expensive masters/Ph.D program courses, practicums, and research works. **2c)** But/ yet on the other hand, the Defendants Portland State University, et al usually and **timely** award/ provide such undergraduate degrees, etc in a very **fairly** and **timely** manner for/ to their **none-colored (white)** students **before** registering them in any of these expensive masters programs. **2d)** This also means that the Defendants PSU et al practiced racial discrimination, racial prejudice and bias against plaintiff who is black.

3) Furthermore, plaintiff filed this lawsuit against the Defendants PSU et al because they **failed** to intervene and provide/ award plaintiff with undergraduate degrees, diplomas, et cetera **before** registering plaintiff in these costly **master/Ph. D** courses, practicums and research works, et cetera

4) Also plaintiff filed this lawsuit against the Defendants PSU et al for their **Bad Faith** actions and inactions which forced plaintiff into **Unwanted** financial borrowings, financial burdens, financial debts, etc- for tuition fees, books, text books, study materials, materials, et cetera; **6)** Plaintiff also filed this lawsuit against the Defendants Portland State University et al because it has been through their **policies, procedures, rules, guidance, directions**, etc- which have been **followed** and guided by their employees.

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7) Also plaintiff have filed this lawsuit against the Defendants PSU for their reckless, **bad faith**, actions and inactions against plaintiff- and for denying and robbing plaintiff opportunities and dreams in life- which education is meant for. 7b) In fact, education is a basic human right that works to raise men and women out of poverty, level of inequality, et cetera; 6) Therefore thus why plaintiff request/demand **Due Process Fair Hearing**- including but not limited to be given reasonable opportunities even for plaintiff's witnesses to appear and testify **Orally** before members of **JURY** from the **Diverse** Public Communities- who are also entitled and have rights to hear and make decisions and/or determination on cases/ matters such as this.

FAIR HEARING is a statutory authorized extrajudicial hearing granted where normal judicial process would be inadequate to secure due process, either because one would suffer grievous harm and/or substantial prejudice to his/her rights before a judicial remedy became available.

PART D: LIBERAL CONSIDERATION For Pro se Filings:

The United States 9th Circuit Court of appeals has repeatedly instructed that

*“ courts **must** continue to construe pro se filings **liberally**. ” Hebbe v. Pille*

627 3d 338 342 (Ninth Circuit Court 2010). Plaintiff is a pro se plaintiff.

Therefore request this court to construe plaintiff's filings **liberally**, and in

Good Faith. 2) Also member of **Jury** from the **Diverse** public communities are entitled and have right to hear **Oral** testimonies even from my witnesses

and see evidences to make decision as to who is right and who is wrong.

PART E: UNDERMINING Plaintiff's ACADEMIC QUALIFICATION

FIRST: 1) Calling and labeling a person of color (Black man) who has earned **3.77 GPA** and **69 credit hours** in **Masters/ Ph.D** programs- as “academically **failure**”, “academically **unqualified**”, **n- word**, etc - the ways plaintiff have been derogatorily labeled/called by some of the PSU's official/employees- is clearly **Unjust** and **racially** motivated- and should be condemned by any open-minded rational/reasonable human being. 2) In fact, Plaintiff's academic qualifications have been so very repeatedly, intentionally and recklessly undermined and minimized by the Defendants PSU employees, officials etc whose salaries, wages, and benefits get paid by the Defendants PSU, et al . 3) And these PSU officials say that they only **follow** PSU's policies, rules, rules, procedure, directions, etc- meaning PSU should pay for these said harms, etc which they caused on plaintiff

2) And yes, plaintiff have been always in a PSU's good academic standing with **3.77 GPA** and **69 credit hours** in **Masters/Ph.D** programs, et cetera.

SECOND: Again, as a direct and proximate result of the Defendants PSU et al' said actions and inactions- plaintiff have sustained emotional distress symptoms such as- anxiety, sleeplessness, headaches, fear, nausea, *etc* .

PART F:

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**The Defendants PSU et al' Reckless Fraudulent Misrepresentation
Of this matter, et cetera: Continued even on December 14, 2023**

**The Defendants PSU's FALSE Info/
Fraudulent Misrepresentation**

**Plaintiff's
Facts/Truth**

1) that Plaintiff is claiming for a degree
in **social studies** (Exhibit 7)

1) plaintiff **NEVER** claimed a
degree in social studies

2) that PSU has awarded plaintiff with a
political science minor degree
(Exhibits 6, 7)

2) PSU has **NEVER** awarded
plaintiff with a "**political science**"
minor degree (Exhibit 1)

3) that Plaintiff became a PSU student for
the first time in 1997 through 2002
(Exhibit 7)

3) plaintiff became a PSU student^{nt}
for the first time in the year 1992

4) that plaintiff only claim for a "degree"
(Exhibit 7)

4) plaintiff claim for equal &
appropriate **timely** & adequate
services, informations, advises,
direction, degrees, diplomas,
certificates, outputs, et cetera
as the Defendant PSU have
been **timely** providing for their
other students, especially to
students of **None-color (whites)**

5) that plaintiff (who is **black**) is
academically failure &
unqualified, **n-word**, etc

5) plaintiff has always been in
a PSU good academic standing
with **3.77 GPA** and **69** credit
hours in **masters/Ph.D** programs.
Plaintiff also has **227** credit hours for
bachelor's degrees programs

7) that on June 17, 2023 PSU awarded
Plaintiff with liberal studies degree
and **political science** minor degree
(Exhibits 6, 7)

7) PSU has **NEVER** awarded
plaintiff with a "**political science**"
minor degree at any time. And
Also plaintiff has **NEVER** got any
degree from PSU on June 17, 2023

8) Evidences show that the **only** degree plaintiff has ever received from PSU was on August 14, 2023; 9) And it was a liberal studies degree-which their/ PSU's Registrars "higher ups" officials **promised** to **immediately** and **timely** award plaintiff with- **without** any further delay in July 28, 2022. 10) The Defendants PSU et al, yet again **breached** their duty when they **FAILED** to **timely** provide plaintiff even with liberal studies degree on/in July 28, 2022 as they promised to do. 11) And by the way, on/ about August 14, 2023- the Defendants PSU et al, yet again, in **Bad Faith**, awarded plaintiff with **only** a liberal studies degree. 12) This was more than a year later after they/PSU promised to **immediately** and **timely** provide plaintiff with it on/in July 28, 2022; 13) Which further means, they /the Defendants PSU et al yet again **FAILED** to **timely** provide plaintiff (who is black) with services, degrees, diplomas, information, certificates, output, et cetera as they/the Defendants generally/ usually, **timely** provide to their other students especially those students of **non-color** (**white** students). 14) To make it even much worse, the Defendants PSU et al have already grossly **breached** their contract/duty when the Defendants PSU and PSU's Registrars Dept **FAILED** to **timely** provide plaintiff with undergraduate degrees, diplomas etc **before** registering plaintiff (and before collecting tuition fees, etc from plaintiff) for **masters/Ph.D** courses, practicums & research works. 15) On the other hand, the Defendants PSU et al have been **timely** awarding undergraduate degrees, diplomas, et cetera to their other students of **none-color** (white students) **before** registering them (white students) for graduate courses. 16) Plaintiff/I have been even called some derogatory/slurs names including: **n-word**, academic failure, etc by a PSU Registrar Dept official who is white. They racially discriminated against me. 17) The Defendants PSU discriminated against plaintiff because he is black. 18) And by the way, plaintiff blindly and loyally followed the PSU' advises, guidance, directions, rules, et cetera for plaintiff's academic dreams. 19a) Their, **bad faith** actions and inactions (and their **failure**) to **timely** provide plaintiff even with this liberal studies degree as they promised that they would on July 28, 2022: forced plaintiff into further more financial debts, financial borrowings, and financial burden- for PSU's tuition fees, textbooks, study materials, note books, other related fees and costs, et cetera 19b) Which also means the Defendants PSU et al should reimburse plaintiff with funds for said debts and outstanding payments, disbursements, et cetera .

The Universal Declaration of Human Rights says that everyone has the right to life, liberty, and security of person, that no one shall be subjected to torture or to cruel, degrading treatment, that everyone has the right to recognition everywhere as a person before the law . The Defendants PSU et al have violated plaintiff's rights of equal protection principle of the 14th Amendments. And they labeled plaintiff who is black as academic failure, N-word, etc.

PART G : CLAIM FOR RELIEF : Plaintiff's Explanation:**17**

1) I/ plaintiff always believe in fairness- and also in providing accurate information to the best of my knowledge, ability and know-how: "so help me God"; 2) I/plaintiff have been a PSU student since the year 1992. And since that year 1992- I have taken and completed about 227 credit hours of undergraduate academic program courses. Also I have already taken and completed 69 credit hours **Masters/Ph.D** programs courses, practicum and research works, etc ; 3) And plaintiff have taken these said PSU's courses, practicums, seminars, research works, etc because PSU's academic advisers have advised, directed and informed plaintiff to take them for degrees, diplomas, certificates, etc. 4) And these PSU academic course, etc do cost several thousands of dollars; 5) My loved ones who sacrificed their limited resources to help me paying for **some** of these PSU academic courses, classe practicums, research works, etc are no longer alive- and I do not have the records of the exact amount of dollars they paid over those periods of time to cover for my college education at PSU. **5b)** But I only know for sure how **upset** they were during the last periods of their lives- that they spent more than **\$260,000** dollars on my PSU education but **never** had a chance to see me graduating from college and help paying back those monies they complaint they spent on my academic education at PSU; 6) Plaintiff always believe in **fairness** and in providing accurate information to the best of my ability- and thus why I stated claim for relief as seen below- and I left it in the hands of impartial **JURY** from **diverse** public community to make such determination. In **Good Faith** plaintiff stated claim for relief as seen below:

Wherefore, I, plaintiff, pray for judgment against the defendant Portland State University et al as follows: 1) For Non-economic and/or punitive damages in a sum of \$3,000,000 (three million dollars) or the maximum sum of dollars which a jury would determine to be reasonable; 2) For economic damages in sum of 2.5 million dollars or the reasonable maximum sum which a jury would determine that plaintiff would have already timely

18

potentially earned if the Defendants PSU would have **timely** provided / awarded plaintiff with academic degrees, diplomas, certificates, etc as from the time plaintiff completed a total of **180 credit** hours of a PSU Bachelor's degree requirement- and/or **45 credit** hours of a PSU master/grad degree requirement; 3) for any reasonable maximum sum of dollars for pains and emotional sufferings which a jury determine that the Defendants PSU have caused on plaintiff; 4) For costs & reimbursements, et cetera.

Sincerely submitted,



wash ouma
(plaintiff)

Dated: June 10, 2024

DECLARATION OF SERVICE

I, Wash Ouma (plaintiff) declare that I served true copies of the claims and summons to the Defendants Portland State University et al at the listed below locations, and through the U.S Postal Services, via restricted USPS Tracked Guaranteed Priority Mail delivery. And the attached are some of the proofs of service to the Defendants. Sign. [Signature] Dated: June 10 /2024

Dr. Ann Cudd/President
Portland State University
630 SW mill street
Portland, Oregon 97205

Attorney Erin Burris
Miller Nash LLP
1140 SW Washington str #700
Portland, Oregon 97201

wash ouma
4110 SE Hawthorne #741
Portland, Oreg 97214

In The United States District Court For The District Of Oregon
Portland Division

19

Case No.

wash ouma
(plaintiff)

vs.

Portland State University, et al
(Defendants)

This matter having come, and presented with evidences before
Court's Judge _____ upon Plaintiff's Motion for
judgment against the Defendant(s)Portland State Univ. et al ; it is therefore:

RULED & ORDERED for the judgment in Plaintiff's favor :

1a) For Non-Economic and/or Punitive Damages in sum of \$3000,000.00
(three million dollars and zero cents only)

1b) Maximum sum of \$_____ dollars which members of **Jury**
would likely determine to be reasonable.

2a) For Economic Damages in sum of: \$2,500,000.00 (two million, five
hundred thousand dollar and zero cents only)

2b) Maximum sum of \$_____ dollars which members of **Jury**
would likely determine to be reasonable.

3) For any reasonable maximum sum of dollars for pain and suffering,
emotional distress, etc which a jury determine that PSU have caused plaintiff

4) For the Court's fees and other costs and reimbursements .

Dated this _____ day of _____, at _____ , Oregon

The Court Judge

Exhibit 1

Exhibit 1c

Portland State University

Portland



Oregon

On recommendation of the University Faculty, and by the authority of the
State of Oregon, Portland State University hereby confers upon

Wash J Ouma

the degree of

Bachelor of Science

Liberal Studies

With all the rights and privileges appertaining thereto. Given on this
Seventeenth Day of June, Two Thousand and Twenty-three.

Gregory K. Amickley
President of the Board

Steve P.
President of the University

Verified Correct Copy of Original 10/31/2023



EXHIBIT A

EXHIBIT 1

Case 3:23-cv-01795-YY Document 1-1 Filed 11/30/23 Page 13 of 22

Exhibit id

Exhibit 2

1	\$2.07 US POSTAGE 4 OZ FIRST-CLASS MAIL FLATS RATE RETAIL	08280013145884 FROM 23469
		stamp and/or 08/04/2023
USPS FIRST CLASS MAIL®		
Portland State University Degree Requirements Office PO Box 751 Portland OR 97207		0024
SHIP TO: WASH J OUMA		
		

Customer: WASH OUMA

Location: Shelf

Package Type: Package

Received On: 8/14/2023



741

Verified Correct Copy of Original 10/31/2023

EXHIBIT A

Page 17 of 27

DO NOT FOLD

Exhibit 2

Under the Family Educational Rights & Privacy Act (FERPA), the information provided in this document is not to be released to others without the written consent of the student.

ACCREDITATION

Portland State University is accredited by the Northwest Association of Schools and Colleges. In addition, numerous schools, colleges, and departments within the university are accredited by special agencies and associations.

FORMER NAMES

Established in 1946 as Vanport Extension Center, the name changed in 1952 to Portland Extension Center, and in 1955 to Portland State College. On February 14, 1969, the institution was named Portland State University (PSU).

CREDITS

PSU operates on the quarter system. Fall, Winter, and Spring terms are each approximately 11 weeks in length. Summer term courses vary in length from 2 to 13 weeks.

REQUIREMENTS FOR GRADUATION

A baccalaureate degree requires a minimum of 180 quarter hours and a 2.00 GPA. An advanced degree requires a minimum of 45 quarter hours. All advanced degree requirements are listed in the PSU Bulletin. Graduate degrees require a minimum 3.00 GPA.

GRADE POINT AVERAGE (GPA)

No GPA is calculated for students last enrolled prior to Fall 1980. The cumulative GPA is determined by dividing the total quality points by the total credit hours for all terms. Only PSU work is used to calculate the GPA. Transfer credits are for information purposes only, and are not included in the GPA calculation.

CREDIT FOR PRIOR LEARNING (CPL)

CPL is awarded on the PSU institutional transcript for certain courses via examination/challenge and portfolio assessment. CPL is identified by a term notation that says "Credit for Prior Learning: PSU Exam Credit" or "Credit for Prior Learning: Portfolio Asmnt".

COURSE NUMBERING SYSTEM

0-99	Basic courses, no degree credit
100-299	Lower Division
300-499	Upper Division
500-699	Graduate
700	Post-baccalaureate, prof. dev., non-degree credit
800	In-service, prof. dev., limited graduate degree credit
199/299/399	Special Studies

Courses that may be taken repeatedly, with varying credit:

At the 400/500/600 level:

Research	x01	Special Projects	x06
Independent Study	x02	Seminar	x07
Thesis	x03	Workshop	x08
Coop Ed/Intern	x04	Practicum	x09
Reading & Conference	x05	Selected Topics	x10

At the 800 level: 808 and 810

AUTHENTICITY

An official transcript displays the seal of PSU and an official signature. Verification or further explanation of authenticity may be obtained by contacting the Office of the Registrar.

GRADING SYSTEM

Grade	Points	Undergraduate	Graduate
A	4.00	Excellent	Excellent
B	3.00	Good	Satisfactory
C	2.00	Satisfactory	Below Standards
D	1.00	Inferior	Failure (no credit)
F	0.00	Failure	Failure
+/-	0.33	Plus or minus 0.33 points to letter grade, excluding A+, F+, F- (effective Fall 1992)	

MARKING SYSTEM (all disregarded in GPA)

I	Incomplete: mark is permanent after one calendar year
IP	In-Progress: select graduate courses and UNST 421
P	Pass: undergraduate C- or better, graduate B- or better
NP	No Pass
W	Withdrawn with no penalty
X	No Grade Received/No Basis For Grade
Y	Invalid grade reported by instructor
AU	Audit
M	Missing Grade

REPEAT POLICY (undergraduate duplicate courses only)

Credit and GPA are retained on the first A, A-, B+, B, B-, C+, C, C-, and all grades in subsequent attempts count in GPA. The first PSU grade of D or F may be forgiven if repeated at PSU for a differentiated grade (not P/NP). In this case, credit is retained on the last grade received. Both grades are retained on the transcript. If repeated more than once, each subsequent grade will be retained on the transcript and counted in the GPA.

Repeated courses appear under the last column "R" (repeat)

E	Excluded from GPA
I	Included in GPA

COURSE NUMBER SUFFIX CODES

W	Writing Intensive Course (or "WIC" in course title)
H	Honors course
U	University Studies Junior Cluster course

OTHER CODES (Used prior to Summer 1991 on grade labels; appear left of credit hour.)

AUD	Audited Course
R or RPT	Repeated Course
G, L, or GRD	Graduate credit for 400 courses; not used after Summer 1990
H or HON	Honors Course
E	Credit by Examination

Other codes are for internal use only.

TERM CODES PREVIOUSLY USED

F	Fall	S	Spring
W	Winter	U	Summer

UNIVERSITY STUDIES PROGRAM (established Fall 1994)

The Academic Requirements Committee of the Faculty Senate established that Freshman and Sophomore Inquiry credits transfer to other institutions as indicated below:

One term of UNST 100-level (5 cr)	5 credits general elective
Two terms of UNST 100-level (10 cr)	10 credits general elective
Three terms of UNST 100-level (15 cr)	3 credits writing (WR 121), 4 credits social science, 4 credits science, and 4 credits arts and letters
One term of UNST 200-level (4 cr)	4 credits lower division writing: applies to PSU lower division writing requirement

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One term of UNST 200-level (4 cr)	4 credits lower division writing; applies to PSU lower division writing requirement

Exhibit 6



BROOKLYN
1410 SE POWELL BLVD
PORTLAND, OR 97202-2398
(800) 275-8777

04/23/2024

11:32 AM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$9.85
Flat Rate Env			
Portland, OR 97205			
Flat Rate			
Expected Delivery Date			
Wed 04/24/2024			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$4.40
Tracking #:			
70211970000174475993			
Return Receipt			\$3.65
Tracking #:			
9590 9402 7061 1225 7622 21			
Total			\$17.90
Grand Total:			\$17.90
Cash			\$20.00
Change			-\$2.10

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

Preview your Mail
Track your Packages
Sign up for FREE @
<https://informedelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: <https://postalexperience.com/Pos>
or scan this code with your mobile device,



or call 1-800-410-7420.

UFN: 406759-0027
Receipt #: 840-59700111-1-6449530-2
Clerk: 01

PS Form 3811, July 2020 PSN 7530-02-000-9033

Article Number (Transfer from service label)
7021 1970 0001 7447 5993

9590 9402 7061 1225 7622 21



Attorney Erin Burris
Miller Nash Law Firm
1140 SW Washington Street
Suite 700
Portland, OR 97205

Article Addressed to:

■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

A. Signature 		B. Received by (Printed Name) Erin	
C. Date of Delivery 4/26/24		D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:	
3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Restricted Delivery		<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	

Domestic Return Receipt

PRIORITY®
★ MAIL ★



VISIT US AT [USPS.COM](https://www.usps.com)®
ORDER FREE SUPPLIES ONLINE

FROM:

Wash Ouma
4110 SE Hawthorne #741
Portland, Oregon 97214

TO:

Attorney Erin Burris
Miller Nash Law Firm
1140 SW Washington Street #700
Portland, Oregon 97205

II. FACTUAL BACKGROUND FOR PURPOSES OF THIS MOTION

Plaintiff asserts the following factual allegations in plaintiff's Complaint and its attachments.¹ Plaintiff took courses at PSU from 1997 through 2002. (Compl. ¶ 3; Exs. 4, 5.)² Plaintiff later took courses at PSU in Fall 2022 through Spring 2023. (Compl. ¶ 3; Exs. 4, 5.) Plaintiff or plaintiff's family paid tuition to PSU for plaintiff to take the courses. (Compl. ¶¶ 1, 4.) Plaintiff's coursework was "under" the 1997 PSU catalogue and PSU's academic advisors "promised" or "assured" plaintiff PSU would confer certain "degrees, diplomas, and certificates." (Compl. ¶¶ 5, 10(c), 10(d).)

On June 17, 2023, PSU awarded plaintiff a Bachelor of Science degree in Liberal Studies with a minor in Political Science. (Compl. ¶ 12; Ex. 1.) On August 14, 2023, plaintiff learned that PSU did not issue plaintiff a Bachelor of Science degree in Social Studies, which plaintiff was expecting to receive because plaintiff had earned 227 credit hours toward a Bachelor's degree and 69 credit hours toward a Master's degree. (Compl. ¶¶ 1-3.) Plaintiff asked PSU's Office of the Registrar why plaintiff had not been awarded a degree in Social Science. (Compl. ¶ 10(a), Ex. 6.) On August 23, 2023, an individual in PSU's Office of the Registrar emailed plaintiff that plaintiff had been awarded a degree of Liberal Studies with a minor in Political Science and that plaintiff had not received a Social Science major because a student "must complete the University Studies degree requirements" and plaintiff had not done so. (Compl. ¶ 10(a), Ex. 6.) Plaintiff alleged that plaintiff's academic advisors and a faculty member

¹ PSU sets forth the following facts from plaintiff's Complaint for purposes of this motion only. PSU does not admit to the truthfulness of any allegation and reserves the right to contest or deny plaintiff's allegations in the future.

² Furthermore, this Motion cites to factual allegations in the Complaint's "Part II" and the attachments, unless stated otherwise.

Exhibit 8

Re: Petition for my degree

From: Cierra Wade (ciwade@pdx.edu)

To: waso3psu2@yahoo.com

Date: Thursday, July 28, 2022 at 03:54 PM PDT

Hello Wash,

After careful consultation with my higher ups, we feel it is best to request that a Bachelor's of Arts in Liberal Studies is the best option. If this is something that you agree to, please also send a statement simply stating that this is the degree that we are asking for. Let me know if you would like to have an appointment to discuss.

Best,

On Sat, Jun 4, 2022 at 9:23 AM Wash Ouma <waso3psu2@yahoo.com> wrote:

Hi Cierra

1) Please accept my sincerest appreciation for ALL your help and support- especially with this petition. Thank you; 2) Again, I am deeply sorry that I only followed my former PSU academic advisor- who advised me to take (and continue with) graduate level classes; b) Which means I thought I was done with undergraduate studies; 3) But now I suffer from eye sight problems, and even very limited computer knowledge; 4) Therefore, please kindly make that petition on my behalf- to receive that (or those) undergraduate degree(s) right now- without taking any other further classes. Thanks again for all your help and support- especially on/with this petition.

Sincerely
wash ousma



Jill Borek
Degree Requirements Specialist

503-725-3468 tel
503-725-5525 fax
jborek@pdx.edu

Office of the Registrar
Post Office Box 751
Portland, Oregon 97207

if

From: Wash Ouma (waso3psu2@yahoo.com)

To: ciwade@pdx.edu

Date: Monday, August 1, 2022 at 01:00 PM PDT

Hi Cierra - THANK you very much- BA in Liberal Studies degree will just be fine for now. Thanks

wash

Exhibit a



BROOKLYN
1410 SE POWELL BLVD
PORTLAND, OR 97202-2398
(800)275-8777

05/22/2024

12:46 PM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$9.85
Flat Rate Env			
Portland, OR 97201			
Flat Rate			
Expected Delivery Date			
Thu 05/23/2024			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$4.40
Tracking #:			
70190140000034169371			
Return Receipt			\$3.65
Tracking #:			
9590 9402 7061 1225 7622 69			
Total			\$17.90
Garden Delights	1	\$13.60	\$13.60
Grand Total:			\$31.50
Cash			\$35.00
Change			-\$3.50

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

Preview your Mail
Track your Packages
Sign up for FREE @
<https://informedelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: <https://postalexperience.com/Pos>
or scan this code with your mobile device,



or call 1-800-410-7420.

UFN: 406759-0027
Receipt #: 840-59700111-1-6505048-2
Clerk: 01

PS Form 3811, July 2020 PSN 7530-02-000-9053

2. Article Number (Transfer from service label)
7019 0140 0000 3416 9371

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	

4. Agent Address

5. Is delivery address different from item 1? ☒ Yes ☐ No

6. If YES, enter delivery address below:

7. Signature of Agent

8. Received by (Print Name)

9. Date of Delivery

10. Signature of Addressee

11. Is delivery address different from item 1? ☒ Yes ☐ No

12. If YES, enter delivery address below:

PRIORITY®
★ MAIL ★

FROM:

Wish Ouma
4110 SE Hawthorne #741
Portland, OR 97214

TO:

Dr. Ann Cudd/President
Portland State University
630 SW Mill Street
Portland, OR 97201

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

Exhibit a

Exhibit **b**

May 21, 2024

1

Atten. Dr. Ann Cudd/President
 Portland State University
 620 SW Mill street,
 Portland, Oregon 97201

FILED MULTNOMAH CO CIRCUIT C
 '24 MAY 21 AM 11:18

Re: Case No: 23CV44594 (Multnomah Circuit Court)
 wash ouma (plaintiff) v. Portland State University & PSU' Registrars Dept (Defendants)

Atten. Dr. Cudd/President of PSU:

1) As you (and your Attorney, Ms. Erin Burris) are clearly aware, it has been plaintiff's / my desire to explore the possibility of voluntary, peaceful, and civil resolution of these matters. 2) Evidences also show that plaintiff, in **Good Faith**, have already generously given you (as the top leader and head of the Defendants PSU et al) more than enough time and opportunities to explore possibility of voluntary, peaceful, and civil resolution of these matters- but no response from any of you. 3) Also as you are clearly aware, plaintiff, in good faith, also already provided you with a brief summary of the facts of these claims, followed by a demand for peaceful, civil, settlement. 4) And as you are also aware, I/ plaintiff, in good faith, repeatedly provided you with these said informations on/ about October 31/2023; Nov. 1, 2023; April 2, 2024; April 16, 2024; etc. 5) Again, I am, again, providing these information to you (and to your attorney Ms. Erin Burris) , in **Good Faith**, for quick negotiating settlement of these matters. Please, please, please .

The Defendants PSU et al' Reckless Fraudulent Misrepresentation
Of this matter, et cetera: Continued even on December 14, 2023

**The Defendants PSU's FALSE Info/
 Fraudulent Misrepresentation**

**Plaintiff's
 Facts/Truth**

1) that Plaintiff is claiming for a degree
 in **social studies** (Exhibit 7)

1) plaintiff **NEVER** claimed a
 degree in social studies

2) that PSU has awarded plaintiff with a
political science minor degree
 (Exhibits 6, 7)

2) PSU has **NEVER** awarded
 plaintiff with a "**political science**"
 minor degree (Exhibit 1)

3) that Plaintiff became a PSU student for
 the first time in 1997 through 2002
 (Exhibit 7)

3) plaintiff became a PSU student
 for the first time in the year 1992

PSU's FALSE/Fraudulent Misrepresentation**Plaintiff's FACTS** 2

4) that plaintiff only claim for a "degree"
(Exhibit 7)

4) plaintiff claim for equal & appropriate **timely** & adequate services, informations, advises, direction, degrees, diplomas, certificates, outputs, et cetera as the Defendant PSU have been **timely** providing for their other students, especially to students of **None-color (white**

5) that plaintiff (who is **black**) is academically failure & unqualified, **n-word**, etc

5) plaintiff has always been in a PSU good academic standing with **3.77 GPA** and **69** credit hours in **masters/Ph.D** programs. Plaintiff also has **227** credit hours for bachelor's degrees programs

7) that on June 17, 2023 PSU awarded Plaintiff with liberal studies degree and **political science** minor degree (Exhibits 6, 7)

7) PSU has **NEVER** awarded plaintiff with a "**political science**" minor degree at any time. And Also plaintiff has **NEVER** got any degree from PSU on June 17, 2023

8) Evidences show that the **only** degree plaintiff has ever received from PSU was on August 14, 2023; 9) And it was a liberal studies degree-which their/ PSU's Registrars "higher ups" officials **promised to immediately** and **timely** award plaintiff with- **without** any further delay in July 28, 2022. 10) The Defendants PSU et al, yet again **breached** their contract when they **FAILED** to **timely** provide plaintiff even with liberal studies degree on/in July 28, 2022 as they promised to do. 11) And by the way, on/ about August 14,2023- the Defendants PSU et al, yet again, in **Bad Faith**, awarded plaintiff with **only** a liberal studies degree. 12) This was more than a year later after they/PSU promised to **immediately** and **timely** provide plaintiff with it on/in July 28, 2022; 13) Which further means, they /the Defendants PSU et al yet again **FAILED** to **timely** provide plaintiff (who is black) with services, degrees, diplomas, information, certificates, output, et cetera as they/the Defendants generally/ usually, **timely** provide to their

Exhibit d

Exhibit d


3

other students especially those students of **non-color** (**white** students).

14) To make it even much worse, the Defendants PSU et al have already grossly **breached** their contract/duty when the Defendants PSU and PSU's Registrars Dept **FAILED** to **timely** provide plaintiff with undergraduate degrees, diplomas etc **before** registering plaintiff (and before collecting tuition fees, etc from plaintiff) for **masters/Ph.D** courses, practicums & research works. 15) On the other hand, the Defendants PSU et al have been **timely** awarding undergraduate degrees, diplomas, et cetera to their other students of **none-color** (white students) **before** registering them (white students) for graduate courses. 16) Plaintiff/I have been even called some derogatory/slurs names including: **n-word**, academic failure, etc by a PSU Registrar Dept official who is white. They racially discriminated against me. 17) The Defendants PSU discriminated against plaintiff because he is black. 18) And by the way, plaintiff blindly and loyally followed the PSU's advises, guidance, directions, rules, et cetera for plaintiff's academic dreams. 19) Their, **bad faith** actions and inactions (and their **failure**) to **timely** provide plaintiff even with this liberal studies degree as they promised on July 28, 2022: forced plaintiff into further more financial debts, financial borrowings, and financial burden- for tuition fees, textbooks, study materials, other related fees and costs. 18a) Which also means PSU should reimburse plaintiff/me with funds for said debts and outstanding payments.

SETTLEMENT DEMAND:

- 1) Payment in the sum of \$3,000,000.00 (three million dollars & zero cents) for Non-Economic and/or Punitive damages
- 2) Payments in sum of \$2,500,000.00 (two million five hundred thousand dollars & Zero cents only) for Economic damages.
- 3a) Payments of outstanding financial debts on loans which the Defendants PSU et al' actions and/or inactions which forced plaintiff in borrowing to cover for PSU's fees etc for undergraduate courses taken by plaintiff in the Fall Term 2022, Winter Term 2023, and Spring Term 2023; 3b) Plaintiff would have **NOT** taken any of these undergraduate courses- should the Defendants PSU et al have **timely** and **immediately** provided plaintiff with said liberal studies degree as PSU promised that they would in July 28, 2022
- 4) For the Court's fees, and other related cost and reimbursements.

Sincerely,

 wash ouma (plaintiff)

Dated: 21st Day of May , 2024.

cc. Dr. Ann Cudd/President
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